

Anti-Corruption Policy

Thai Union Feedmill Public Company Limited (the “Company”) conducts its business within the framework of good corporate governance, ensuring transparency and accountability, while taking into consideration all stakeholders, the economy, society, the environment, and the reputation of the Company, as well as its shareholders and investors. Therefore, the Company conducts its business with morality, ethics, and integrity, and upholds good corporate governance to ensure that all activities are performed with honesty, transparency, and fairness. The Company is aware of any potential negative impacts on stakeholders, the economy, society, the environment, the Company’s reputation, shareholders, and investors, and is committed to resolving and mitigating such impacts. The Company aims to contribute to the sustainability of its business and to demonstrate genuine responsibility toward stakeholders, the economy, society, the environment, shareholders, and investors. Accordingly, the Company has adopted the following Anti-Corruption Policy:

The Company shall not accept or support any form of corruption under any circumstances and shall strictly comply with this Anti-Corruption Policy. The Company shall establish a responsible organizational structure, risk management systems, internal controls, and internal audits to prevent and suppress corruption within the organization, and to prevent and/or address all forms of corruption to ensure compliance with this policy. The Company shall regularly review its practices and procedures to align with changes in laws and business operations, and to maintain business conduct that is lawful and fair. Directors, executives, and employees are required to comply with this policy and communicate it to external stakeholders to mitigate corruption risks.

Additionally, any act of corruption committed by directors, executives, or employees shall be considered a serious disciplinary offense and will be subject to disciplinary actions as prescribed in the Company’s work regulations.

The Company shall provide protection for directors, executives, or employees who refuse to engage in corruption, in accordance with its Anti-Corruption Policy and guidelines.

Scope

This policy applies to all directors, executives, and employees of the Company and its subsidiaries, as well as to business partners or third parties acting on behalf of the Company.

Definition of Corruption under this Policy

1. Any misconduct that violates one's duties inappropriately for one's position as a director, member of subcommittees, executive, employee, agent, or other relationship with the Company, with the intention of obtaining improper benefits for oneself or others; or
2. Offering bribes to government officials, or soliciting/accepting bribes from business partners or others to induce unlawful actions, avoid legal compliance, violate rules, regulations, moral standards, or the Company's policies and operational procedures; or
3. Embezzlement of Company funds or assets entrusted for work purposes, or misuse of Company working hours for personal gain or for unrelated activities.

Bribery

means offering, giving, or promising any benefit, whether monetary or otherwise, as an incentive to induce unlawful actions, avoid legal compliance, violate regulations, or breach good moral conduct.

Solicitation of Bribes

means using authority derived from one's position to demand, persuade, or threaten to obtain monetary or non-monetary benefits for one's own or another person's improper gain.

Embezzlement

means using money or assets entrusted for work, or using Company working hours for personal benefit, others' benefit, or unrelated activities.

Anti-Corruption Guidelines

General Practices

Directors, executives, and employees must perform their duties without exploiting or allowing others to exploit their authority, directly or indirectly, to solicit or engage in corruption for personal or others' improper benefit, or to obtain undeserved advantages.

Practices on Gifts, Hospitality, Service Fees, and Other Expenses

- Directors, executives, and employees are prohibited from requesting, receiving, or giving any improper benefits in the form of cash, gifts, valuables, or services from partners, agents, creditors, external parties, or competitors under any dishonest or preferential circumstances.
- Hospitality or traditional gift-giving must comply with Company regulations. Where no regulations exist, such activities must be appropriate, prudent, transparent, and free from hidden intent.
- If directors, executives, or employees become aware of excessive or inappropriate hospitality or gifts, or receive items of abnormal value, they must decline them and report the matter to their supervisor or relevant personnel.

Political Contributions

- The Company maintains political neutrality and does not support political activities directly or indirectly.
- Directors, executives, and employees have legal political rights and freedoms but must not act in ways that compromise the Company's neutrality or harm its interests.
- Directors, executives, and employees are prohibited from using Company funds, assets, goods, or services to support political activities or from using Company resources (e.g., personnel, facilities) for political promotion.

Charitable Donations

In making charitable donations, directors, executives, and employees must act transparently and without hidden purposes, such as bribery, gaining business advantage, or political support. Donations must:

- Be verifiable with evidence of actual charitable projects and activities, supporting their objectives and creating genuine social benefits or fulfilling CSR objectives.
- Be free from obligations or reciprocal benefits for any individuals or organizations, except for normal acknowledgments such as displaying the Company's logo or public recognition.

Sponsorship

Sponsorships are a form of business promotion, different from charitable donations, and may serve business, brand, or reputational purposes. They must comply with the following:

- Sponsored activities must be verified as real and aligned with project objectives, contributing to social benefit or CSR aims.
- Sponsorships or monetary-equivalent benefits (e.g., accommodation, meals) must not involve reciprocal benefits for individuals or entities, except for standard business acknowledgments.
- Sponsorship requests must include documentation specifying recipients and objectives and be submitted to authorized Company personnel for approval.

Roles and Responsibilities

Board of Directors

- Oversee and ensure business transparency and compliance with anti-corruption policies, practices, and procedures. The Audit Committee supervises internal controls over financial and operational processes, accounting, record-keeping, and other areas relevant to anti-corruption measures. Ensure proper channels exist for whistleblowing and for providing guidance on anti-corruption measures and regularly report audit results to the Board.
- Implement the Anti-Corruption Policy by delegating operational responsibilities to management.

- Review and improve the Anti-Corruption Policy for Board approval.

Secretary to the Board of Directors

- Study and monitor corporate governance developments to improve the Company's practices and report annual governance performance to the Board.
- Promote and support compliance with the CSR and Anti-Corruption Policy among directors and employees.

Audit Committee

- Oversee internal controls related to financial and operational processes, accounting, record-keeping, and all other anti-corruption-related processes.
- Ensure good corporate governance is sufficiently implemented in accordance with policies, requirements, and applicable laws.
- Maintain whistleblowing channels, provide guidance on anti-corruption measures, and regularly report to the Board.
- Upon finding or suspecting any actions that may significantly impact the Company's financial position or performance, including fraud, the Audit Committee shall report such matters to the Board for corrective action within an appropriate timeframe.

Executive Committee

- Implement the Anti-Corruption Policy and communicate it to internal and external stakeholders, ensuring appropriate management systems and measures, and conducting continuous review.
- Monitor and prevent corruption risks in assigned responsibilities and report suspicious or potentially corrupt activities.

Management

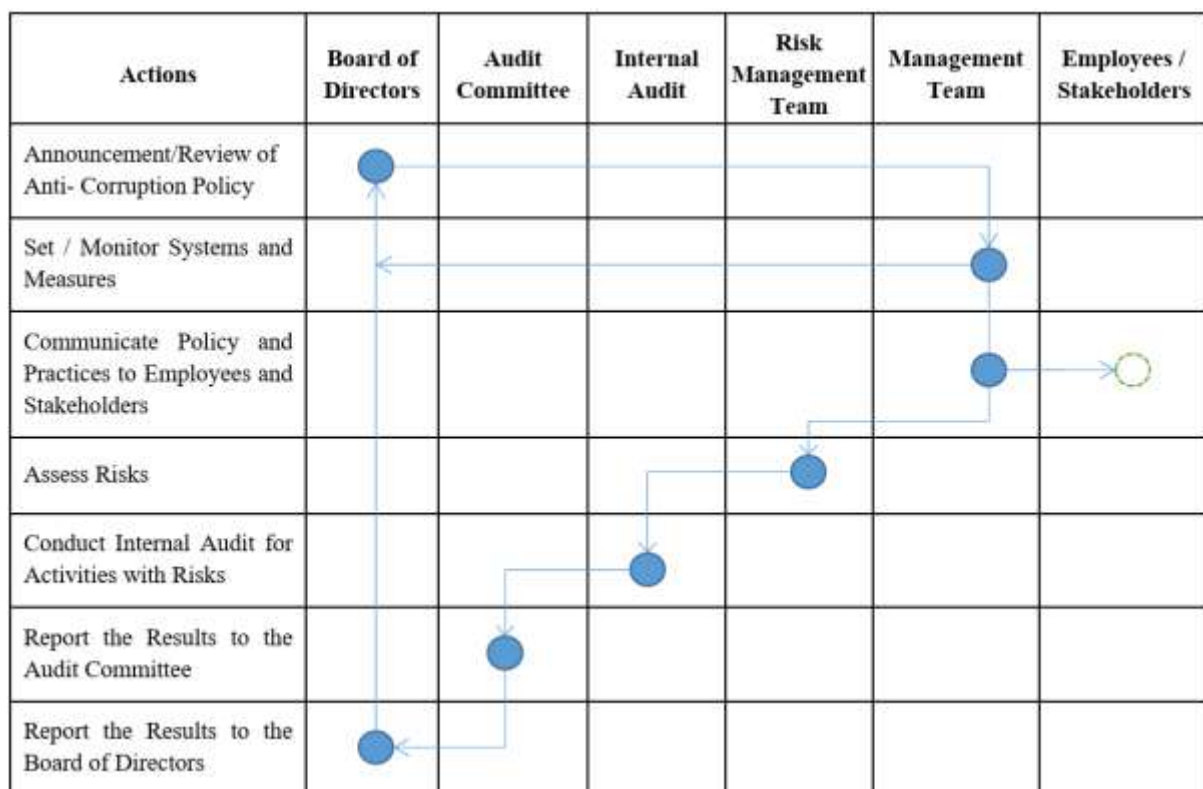
- Implement and communicate the Anti-Corruption Policy and ensure appropriate management systems and anti-corruption measures, continuously reviewing them to align with legal and business changes.

- Monitor and prevent corruption risks in assigned duties and report suspicious or potentially corrupt activities.

Internal Audit Department

Acts as an independent unit reporting directly to the Audit Committee, responsible for auditing all departments for compliance with Company regulations and assessing the adequacy and effectiveness of internal controls following the principles of good corporate governance.

Anti-Corruption Procedures



Whistleblowing and Complaint Process

The Internal Audit Department shall provide accessible and confidential channels for employees and stakeholders to report suspicious or potentially corrupt acts. Current reporting channels include:

Internal:

1. Supervisors or managers
2. Suggestion box
3. Email: IA.TFM@Thaiunion.com

External:

1. Company website: www.thaiunionfeedmill.com
2. Postal mail:
Thai Union Feedmill Public Company Limited
89/1 Moo 2, Rama 2 Road, Kalong Subdistrict, Mueang District, Samut Sakhon 74000
Tel: 034-417-222

Disciplinary Actions

Any individual who commits corruption shall be deemed to have violated the Company's personnel management regulations. Employees, executives, members of subcommittees, and directors are subject to disciplinary action and may also face legal penalties if the act violates applicable laws.

This policy was reviewed and approved by the Board of Directors Meeting No. 7/2025 on 4 December 2025 and shall take effect from 8 December 2025 onwards.

-Signature-

(Mr. Rittirong Boonmechote)
Chairman of the Board of Directors

Revision History Table

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